

RCRAInfo CM&E EVALUATION - VIOLATION FORM

NOV 10 2006 March 2006

*EPA ID Number		PAD980552251		EIN			
Handler Name		Ashland Chemical Co					
Street		2801 Christopher Columbus Blvd					
City		Philadelphia		State		PA	
				Zip Code		19148	
Actual Generator Status				LQG <input type="checkbox"/> SQG <input type="checkbox"/> CESQG <input type="checkbox"/> Closed <input type="checkbox"/> Non-Handler <input type="checkbox"/>			
Check only if different from Notified Status.							
Universe Change Required? (Generator Status Change Required)				YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Universe Change Section (on reverse side of this form).			
RCRA Non-Notifier?				YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Handler Section (on reverse side of this form).			
Other Facility Information Changes?				YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Handler Section (on reverse side of this form).			
*EVALUATION		<input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete		You must provide an Evaluation Identifier (also known as the Sequence Number).			
*Evaluation Identifier	*Type	*Evaluation Start Date (mm/dd/yyyy)	*Agency	Responsible Person	Suborganization		
001	CEI	09/10/2006	S	LAT	PADGPW		
Day Zero (mm/dd/yyyy): You need to specify Day Zero for all evaluation types except CDI, CSE, FUI, SNN, and SNN, otherwise it defaults to Evaluation Start Date. For CDI, CSE, FUI, and SNN evaluations, you must select a previous CEI Start Date for the Day Zero. SNN evaluation type does not require a Day Zero.				9/16/2006 Reclassified SV Date: Only applicable for SNN evaluation type as appropriate.			

Notes:

Evaluation Indicator Field (Check all that apply)							
<input type="checkbox"/> Citizen-Complaint		<input checked="" type="checkbox"/> Multimedia Inspection		<input type="checkbox"/> Sampling		<input type="checkbox"/> Not Subtitle C	
Focused Coverage Areas (Use Only for Evaluation Type FCI)							
Regulation-Specific FCI							
BIF <input type="checkbox"/>	CCI <input type="checkbox"/>	CFI <input type="checkbox"/>	INC <input type="checkbox"/>	LDR <input type="checkbox"/>	PTB <input type="checkbox"/>	PTX <input type="checkbox"/>	
THI <input type="checkbox"/>	UIC <input type="checkbox"/>	UOI <input type="checkbox"/>	UWR <input type="checkbox"/>	OTHER (specify):			
Routine/Standardized FCI							
CAR <input type="checkbox"/>	CPC <input type="checkbox"/>	DOS <input type="checkbox"/>	EMR <input type="checkbox"/>	IEI <input type="checkbox"/>	ISI <input type="checkbox"/>	RTI <input type="checkbox"/>	
Does this Evaluation Add/Update/Delete a Violation?				YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		If Yes, fill in the Violations Section(s) on page 2 of this form.	
Does this Evaluation link to a Commitment?				YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.	
Does this Evaluation link to a 3007 Request?				YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.	
OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If Yes, fill in information below.							
*Seq. No.	*Violation Type	*Agency	*Regulation Citation (Type + Citation) (ex. FR 262.1)			*Date Determined (mm/dd/yyyy)	

*Required Fields



HAZ → 1562126
RES → 1562127

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR

☐ S Q GENERATOR

Company name Ashland Chemical Company

EPA I.D. Number PAD980552251

Employer I.D. Number (EIN) _____

Site Address 2801 Christopher Columbus Blvd

County Philadelphia

Municipality Philadelphia

Zip 19148

Name of Inspector Laura Johnson, Seth DiLorenzo

Name & Title of Responsible Official Abigail Davis

Person Interviewed same

Telephone (215) 446-7900

Mailing Address (if different from above) _____

Amount of Hazardous Waste Generated per Month: _____ Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____

PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____

GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☒ Small Quantity Handler

Universal Waste Types light bulbs, batteries

3. Hazardous Waste Transporters:

Transporter Name Ashland Inc License Number NYD049253719

Transporter Name _____ License Number _____

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D001	Waste Flammable Liquid-Styrene	Ashland Inc
F003	Waste Flammable Liquid-Toluene/Acetone	NYD049253719
F005	Styrene	3 Broad Street
		Binghamton, NY 13902

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Ashland Chemical ID Number PAD 980552251 Date 9/6/2006

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
x				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
X				Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Ashland Chemical ID Number PAD 980552251 Date 9/6/2006

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Ashland Chemical ID Number PAD 980552251 Date 9/6/2006

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				LQG TANKS (Subchapter J)			
	X			Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
	X			Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
	X			Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
	X			Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
	X			Tanks labeled to accurately identify contents	265a.194		H044
	X			Required inspections completed and documented in operating log	265a.195	265.195	H045
	X			Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
	X			Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
	X			Special small quantity generator requirements	265a.1	265.201	H048
				SQG TANKS			
	X			Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
	X			Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
	X			If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
	X			Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
	X			Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
	X			All waste removed at closure	265a.1	265.201(d)	H056
	X			Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
	X			Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
	X			Incompatible waste requirements met	265a.1	265.201(f)	H059

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Ashland Chemical

ID Number PAD 980552251

Date 9/6/2006

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				Containment Buildings (Subchapter T)			
	X			Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
	X			Meets special requirements if liquids present	265a.1	265.1101(b)	H062
	X			Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1) (i)	H063
	X			Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1) (ii)	H064
	X			Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1) (iii)	H065
	X			No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1) (iv)	H066
	X			Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
	X			Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H068
				Drip Pads (Subchapter S)			
	X			Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
	X			Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
	X			(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
	X			(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
	X			Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
	X			Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
	X			Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
	X			Release reporting requirements met	265a.1	265.443(m)	H076
	X			Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection ID _____

Field Code _____

INSPECTION REPORT – RESIDUAL WASTE GENERATOR

Site I.D.: PAD980552251Telephone #: 215-446-7900Site Name: Ashland Chemical CompanyOperator Name: sameAddress: 2801 Christopher Columbus Blvd

Address: _____

Municipality: PhiladelphiaCounty: PhiladelphiaResponsible Official: Abigail DavisTitle: Process EngineerPerson Interviewed: sameTitle: sameInspector: Laura Johnson, Seth DiLorenzoTitle: Solid Waste InspectorseFACTS ID #: PF _____ SF _____Inspection Date: 9/6/2006 Type: routine No. of Violations: 0 Time: 11:00amWaste Description: Plant Trash Waste Code: 407 & 409Treatment: ☐ Yes ☒ No Type: _____Type of Storage: ☐ Containers ☐ Tanks ☐ Piles ☐ Impoundments

Disposition: Destination Facility _____

Location: _____ Type: _____

Amount Generated: _____ lb./mo.

Waste Description: Sandblast Grit Waste Code: 109 & A06Treatment: ☐ Yes ☐ No Type: _____Type of Storage: ☐ Containers ☐ Tanks ☐ Piles ☐ Impoundments

Disposition: Destination Facility _____

Location: _____ Type: _____

Amount Generated: _____ lb./mo.

Waste Description: _____ Waste Code: _____

Treatment: ☐ Yes ☐ No Type: _____Type of Storage: ☐ Containers ☐ Tanks ☐ Piles ☐ Impoundments

Disposition: Destination Facility _____

Location: _____ Type: _____

Amount Generated: _____ lb./mo.

Waste Description: _____ Waste Code: _____

Treatment: ☐ Yes ☐ No Type: _____Type of Storage: ☐ Containers ☐ Tanks ☐ Piles ☐ Impoundments

Disposition: Destination Facility _____

Location: _____ Type: _____

Amount Generated: _____ lb./mo.

1 - No Violation Observed 2 - Not-Applicable 3 - Not-Determined 4 - Non-Compliance

Page 3 of 10

Commonwealth of Pennsylvania
Department of Environmental Protection
Bureau of Land Recycling & Waste Management

Inspection Report Comments

Date of Inspection September 6, 2006
Company/Facility/Site Name Ashland Chemical Company

A routine hazardous waste and residual waste inspection took place at Ashland Chemical, 2801 Christopher Columbus Blvd on September 6, 2006 by Laura Johnson and Seth DiLorenzo from the Department. Abigail Davis, Process Engineer was the facility guide. Ashland Chemical is a chemical manufacturer who specializes at producing polyester and vinyl ester resins that are kept liquid with the addition of styrene or other solvents. These polymers are then sold and used to make other products. During the time of the inspection the following was observed:

1. The inspection began by looking at the loading dock area. In this area there is a satellite accumulation drum, which was properly labeled. The drum contains styrene filter bags. Also in this area was a drum that contained polyester drainings which will be reused in the process. The loading dock area was clean and had no violations observed
2. The next area that was observed was the satellite accumulation area from the condensate from the lines. This drum was correctly labeled and was observed to have spent solvent in it.
3. Outside the drumming room is another satellite accumulation area. This was also labeled and seems to be managed correctly.
4. The 90-day storage area was next observed. This area was correctly labeled and all the drums were correctly stored on containment pads. During the time of the inspection there was one drum that was labeled but was not dated. It was determined that this drum was brought to the area today and this violation was corrected during the time of the inspection. Overall there were 8-55 gallon drums on the pad and 2 smaller containers. The earliest date that was observed in the storage area was 6/7/2006. This will be picked up later this week. The facility is currently shipping its used leather gloves out as hazardous waste due to a high chromium levels that came back as a routine residual waste analysis. They are currently trying to find an alternative for

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Abigail L. Davis Date 9/6/06
Inspector (signature) Laura Johnson Date 9/6/06

Commonwealth of Pennsylvania
Department of Environmental Protection
Bureau of Land Recycling & Waste Management

Inspection Report Comments

Date of Inspection September 6, 2006

Company/Facility/Site Name Ashland Chemical Company

these gloves. Other wastes observed were outdated material and methyl methacrylate. The waste is picked up the 3rd week of every month.

5. The residual waste compactor was also observed and was correctly labeled and was covered.
6. Throughout the plant are carbon filters that are hooked up to the process lines. When it is time for them to be changed they are shipped out as a hazardous waste.
7. All of the water and any spills are sent to a wastewater tank at the facility. They currently have a Philadelphia Water Department discharge permit and constantly monitor for pH, refractive index and temperature. The permit was observed it expires in December 2009.
8. A tour of the reactor building was taken and everything looked to be managed correctly.
9. The satellite drum outside the storage tank area was observed. It contained phthalic anhydride.
10. Throughout the facility fire extinguishers were observed and all appear to have been serviced in August of 2006.
11. Lastly the paperwork was observed. The PPC plan was recently updated and contains all of the necessary information. The training records, 90-day weekly inspection log and Biennial reports for hazardous and residual waste were observed to be current and correct. The 25R and 26R's for residual waste were also observed and were complete. The source reduction for hazardous waste was also observed and is thoroughly completed. The manifests were observed and are properly completed and routed within the proper time limits.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) april L. Davis Date 9/6/06

Inspector (signature) Heather John Date 9/6/06

Commonwealth of Pennsylvania
Department of Environmental Protection
Bureau of Land Recycling & Waste Management

Inspection Report Comments

Date of Inspection September 6, 2006
Company/Facility/Site Name Ashland Chemical Company
No Violations were observed

It is recommended that all drums are dated immediately upon movement to the 90-day storage area

A copy of this inspection report will be reviewed and left with the facility

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Gregory L. Davis Date 9/6/06
Inspector (signature) [Signature] Date 9/6/06
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14386511 (rev)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 4/8/05
Time Start 1:30 pm
Time Finish 4:15 pm

HAZARDOUS WASTE INSPECTION REPORT

☒ **GENERATOR** ☐ **S Q GENERATOR**

Company name Ashland Specialty Chemical Company I.D. Number PAD980552251
Site Address 2801 Christopher Columbus Blvd.
County Philadelphia Municipality Philadelphia Zip 19148
Name of Inspector Aleta L. Finney
Name & Title of Responsible Official Karen Ferguson, Office Manager
Person Interviewed same Telephone (215) 446-7900
Mailing Address (if different from above) same
Amount of Hazardous Waste Generated per Month: ~2500 Pounds _____ Kgs _____

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____
PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____
GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☒ Small Quantity Handler

Universal Waste Types Fluorescent Bulbs, Batteries

3. Hazardous Waste Transporters:

Transporter Name Ashland Distribution Company License Number NYD049253719
Transporter Name _____ License Number _____
Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
F003, F005	Toluene, Acetone	Ashland Distribution
D001	Styrene	3 Broad St
D001, D007	Methyl Methacrylate	Binghamton, NY 13902
D002, D008	Sodium Hydroxide	NYD049253719
U190	Phthalic Anhydride	
D001	Methyl Methacrylate/Styrene	
D001	Waste Aerosols	

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Ashland Chemical ID Number PAD980552251 Date April 8, 2005

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Identification Number	262a.10	262.12	H002
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Authorized transporters only	262a.10	262.12(c)	H003
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Subsequent notification requirements met	262a.12(b)		H004
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper manifest used	262a.10	262.21	H005
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests filled out correctly and completely	262a.20		H006
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests signed and routed properly	262a.23(a)	262.23	H007
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Specified records retained for three years	262a.10	262.40(c)	H014
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Exception reporting procedures followed	262a.42	262.42	H016
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Spill reporting procedures followed	262a.10	262.34(d)	H017
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PPC plan developed and implemented	262a.10	262.34(a)	H018
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements followed for international shipments	262a.10	262.50 262.60	H019
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Source reduction strategy prepared and available (LQG only)	262a.100		H020
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Ashland Chemical ID Number PAD980552251 Date April 8, 2005

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers of hazardous waste in good condition	265a.1	265.171	H026
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers and stored waste compatible	265a.1	265.172	H027
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed to prevent leaks	265a.1	265.173(b)	H029
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container storage areas inspected at least weekly	265a.1	265.174	H031
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper containment and collection systems in place	265a.179		H033
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

INSPECTION REPORT COMMENTS

Company/Facility/Site Name: Ashland Specialty Chemical Company

Identification Number: PAD980552251

Date of Inspection: Friday, April 8, 2005

Aleta L. Finney, Solid Waste Specialist with the Department, conducted a large quantity hazardous waste generator inspection and a large quantity residual waste inspection. Present from the facility was Karen Ferguson, Office Manager.

The inspection began with a short tour of the facility. The facility makes polyester resins. There are four satellite accumulation areas at the facility. Only three of the areas had drums present for inspection; the fourth area had none. One area was accumulating spent filter bags from the filtering of the resin before being loaded into tanker trucks, another was accumulating filter bags from filtering of the resin before being pumped into drums and the other area was accumulating a spent carbon drum from the venting of the product storage tanks. The areas that were accumulating the spent carbon and the filter bags from the filtering of the resin before being loaded into tankers did not have the words "hazardous waste" or the contents contained within located on the drums. This is contrary to 25 PA Code Section 262.34(c). Ms. Ferguson put a hazardous waste label on the drum at the time of the inspection, thereby correcting the violation. The other area that was accumulating filter bags from the filtering of the resin before being loaded into drums was not closed. This is contrary to 25 PA Code Section 262.34(c). The drum was closed at the time of the inspection. This violation is thereby corrected.

The main storage area was inspected next. The storage area had 3 drums of hazardous waste and 1 drum of non-hazardous waste. There were 3 drums whose hazardous constituent is methyl methacrylate, one containing rags, one spent solvent, and last filter bags. The oldest accumulation date on any of the drums is March 28, 2005. All containers were properly labeled, closed and in secondary containment. There were also 2 other hazardous waste drums of floor sweepings containing phthalic anhydride. These drums did not have an accumulation date at the time of the inspection. This is contrary to 25 PA Code Section 262.34(a)(2). Ms. Ferguson put the accumulation date on the drums at the time of the inspection, thereby correcting the violation.

The facility had no universal waste bulbs onsite but they did have some batteries. The 5-gallon container of batteries was labeled "waste batteries". These universal wastes no longer get shipped out to a TSD facility on a manifest but get directly FEDEXed to AERC in Allentown for recycling. The facility has only had one shipment of waste using this method thus far.

The facility generates plant trash and occasionally, sand blast grit from the cleaning of tanks. There was only plant trash that was at the facility at the time of the inspection. The waste is kept in a roll-off container where the wastes are compacted and ultimately disposed of by ARC Waste. The roll-off itself was properly labeled with the words "residual waste".

Finally, the paperwork was reviewed. The hazardous waste manifests from the year 2004 were examined. All appeared to be correctly completed and returned to the facility in a timely manner. The PPC plan, residual and hazardous

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature) _____

Date

4/11/05

Inspector Signature) _____

Date

4/11/05

File name: Ashland Chemical (rpt).doc

Page

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INSPECTION REPORT COMMENTS

Company/Facility/Site Name: Ashland Specialty Chemical Company

Identification Number: PAD980552251

Date of Inspection: Friday, April 8, 2005

waste biennial reports and inspection logs were completed. The last time that the facility had HAZWOPER/RCRA training was in the third quarter of 2004. Ms. Ferguson will have other hazardous waste training in April 12, 2005. The source reduction strategies for both hazardous and residual wastes were completed as well as the annual certification of residual waste.

RECOMMENDATIONS:

- 1) Ensure that all hazardous waste drums have the proper labeling, including an accumulation date when in main storage.
- 2) Ensure that all drums that are in satellite accumulation have the words "hazardous waste" or a listing of the contents located on the drum.
- 3) Ensure that all drums that are in satellite accumulation are closed unless actively filling or emptying the drum.

Three violations were cited; three were corrected at the time of the inspection.

The results of this inspection were reviewed with was left with Ms. Ferguson before leaving the facility. A copy of this report was left with Ms. Ferguson on Monday, April 11, 2005.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature)

Karen Ferguson

Date

4/11/05

Inspector (Signature)

Aleta L. Finney

Date

4/11/05

File name: Ashland Chemical (rpt).doc

Page *5* of *5*



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date

4/15/04

Time Start

9:00 AM

Time Finish

12:00 PM

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR ☐ S Q GENERATOR

Company name Ashland Specialty Chemical Company I.D. Number PAD980552251
 Site Address 2801 Christopher Columbus Blvd.
 County Philadelphia Municipality Philadelphia Zip 19148
 Name of Inspector Aleta L. Finney
 Name & Title of Responsible Official Karen Ferguson, Office Manager
 Person Interviewed same Telephone (215) 446-7900
 Mailing Address (if different from above) same
 Amount of Hazardous Waste Generated per Month: ~2500 Pounds _____ Kgs _____

1. Site Characterization:STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad**2. Universal Waste:** ☐ Large Quantity Handler ☒ Small Quantity HandlerUniversal Waste Types Fluorescent Bulbs**3. Hazardous Waste Transporters:**Transporter Name Ashland Distribution Company License Number NYD049253719

Transporter Name _____ License Number _____

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
F003, F005	Toluene, Acetone	Ashland Distribution
D001	Styrene	3 Broad St
D001, D007	Methyl Methacrylate	Binghamton, NY 13902
D002, D008	Sodium Hydroxide	NYD049253719
U190	Phthalic Anhydride	
D001	Methyl Methacrylate/Styrene	
D001	Waste Aerosols	

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Ashland Chemical ID Number PAD980552251 Date April 15, 2004

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Identification Number	262a.10	262.12	H002
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Authorized transporters only	262a.10	262.12(c)	H003
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Subsequent notification requirements met	262a.12(b)		H004
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper manifest used	262a.10	262.21	H005
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests filled out correctly and completely	262a.20		H006
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests signed and routed properly	262a.23(a)	262.23	H007
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Specified records retained for three years	262a.10	262.40(c)	H014
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Exception reporting procedures followed	262a.42	262.42	H016
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Spill reporting procedures followed	262a.10	262.34(d)	H017
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PPC plan developed and implemented	262a.10	262.34(a)	H018
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements followed for international shipments	262a.10	262.50 262.60	H019
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Source reduction strategy prepared and available (LQG only)	262a.100		H020
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Ashland Chemical ID Number PAD980552251 Date April 15, 2004

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers of hazardous waste in good condition	265a.1	265.171	H026
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers and stored waste compatible	265a.1	265.172	H027
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed to prevent leaks	265a.1	265.173(b)	H029
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container storage areas inspected at least weekly	265a.1	265.174	H031
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper containment and collection systems in place	265a.179		H033
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection ID _____

Field Code _____

INSPECTION REPORT – RESIDUAL WASTE GENERATOR

Site I.D.: PAD980552251Telephone #: 215-336-6500Site Name: Ashland ChemicalOperator Name: sameAddress: 2801 Christopher Columbus Blvd.Address: samePhiladelphia, PA 19148Municipality: PhiladelphiaCounty: PhiladelphiaResponsible Official: Joe RogersTitle: Office ManagerPerson Interviewed: Joe RogersTitle: Office ManagerInspector: Aleta L. FinneyTitle: Solid Waste SpecialisteFACTS ID #: PF SFInspection Date: 03/20/2003 Type: 1No. of Violations: 0 Time: 1:00 pmWaste Description: Plant Trash Waste Code: 407 & 409Treatment: ☐ Yes ☒ No Type: _____Type of Storage: ☒ Containers ☐ Tanks ☐ Piles ☐ ImpoundmentsDisposition: Destination Facility BFI Conestoga LandfillLocation: Morgantown, PA Type: LandfillAmount Generated: 47 tons/yr lb./mo.

Waste Description: _____ Waste Code: _____

Treatment: ☐ Yes ☐ No Type: _____Type of Storage: ☐ Containers ☐ Tanks ☐ Piles ☐ Impoundments

Disposition: Destination Facility _____

Location: _____ Type: _____

Amount Generated: _____ lb./mo.

Waste Description: _____ Waste Code: _____

Treatment: ☐ Yes ☐ No Type: _____Type of Storage: ☐ Containers ☐ Tanks ☐ Piles ☐ Impoundments

Disposition: Destination Facility _____

Location: _____ Type: _____

Amount Generated: _____ lb./mo.

Waste Description: _____ Waste Code: _____

Treatment: ☐ Yes ☐ No Type: _____Type of Storage: ☐ Containers ☐ Tanks ☐ Piles ☐ Impoundments

Disposition: Destination Facility _____

Location: _____ Type: _____

Amount Generated: _____ lb./mo.

1 - No Violation Observed 2 - Not-Applicable 3 - Not-Determined 4 - Non-Compliance

Page 5 of 7

INSPECTION REPORT COMMENTS

Company/Facility/Site Name: Ashland Specialty Chemical Company

Identification Number: PAD980552251

Date of Inspection: Thursday, April 15, 2004

Aleta L. Finney, Solid Waste Specialist with the Department, conducted a large quantity hazardous waste generator inspection and a large quantity residual waste inspection. Present from the facility was Karen Ferguson, Office Manager.

The inspection began with a short tour of the facility. The facility makes polyester resins. There are three satellite accumulation areas at the facility. Only two of the areas had drums present for inspection; the third area had no satellite drum at the time of the inspection. These two areas had drums that were properly labeled and closed. One area was accumulating spent filter bags from the filtering of the resin before being loaded into tanker trucks and the other area was accumulating spent carbon drums from the venting of the product storage tanks.

The main storage area was inspected next. The storage area had 9 drums of hazardous waste and no drums of non-hazardous waste. There were 7 drums of styrene/methyl methacrylate and 2 drums of toluene/acetone. The oldest accumulation date on any of the drums is March 26, 2004. There were also two 4x4 cardboard containers of spent filter cartridges. The containers were properly labeled and closed. The facility also had a box of 42 universal waste-bulbs. The facility had labeled the box "universal waste-bulbs".

The facility generates plant trash and occasionally, sand blast grit from the cleaning of tanks. There was only plant trash that was at the facility at the time of the inspection. The waste is kept in a roll-off container where the wastes are compacted and ultimately disposed of by ARC Waste. The roll-off itself was properly labeled with the words "residual waste".

Finally, the paperwork was reviewed. The hazardous waste manifests from the year 2003-2004 were examined. All appeared to be correctly completed and returned to the facility in a timely manner. The residual waste bills of lading were reviewed. The facility gets a pickup from ARC about once per month. The PPC plan, residual and hazardous waste biennial reports and inspection logs were completed. The last time that the facility had HAZWOPER/RCRA training was in the third quarter of 2003. Ms. Ferguson had other hazardous waste training in both January and April 2004. The source reduction strategy for residual was completed as well as the annual certification of residual waste. Ms. Ferguson could not locate the waste minimization plan for the hazardous waste at the time of the inspection. She agreed to fax the information to me as soon as possible.

RECOMMENDATIONS:

- 1) The facility should ensure that all drums are labeled with a date as soon as they are moved over to the main storage area.

No violations were cited.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature)

Karen Ferguson

Date

4/15/04

Inspector Signature

Aleta L. Finney

Date

4/15/04

File name: Ashland Chemical (rpt)

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Company/Facility/Site Name: Ashland Specialty Chemical Company

Identification Number: PAD980552251

Date of Inspection: Thursday, April 15, 2004

The results of this inspection were reviewed with and a copy of this report was left with Ms. Ferguson before leaving the facility.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature)

Karen Ferguson

Date

4/15/04

Inspector Signature)

Melita L. Finney

Date

4/15/04

File name: Ashland Chemical (rpt)

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 3/20/03
Time Start 1:00 pm
Time Finish 3:30 pm

HAZARDOUS WASTE INSPECTION REPORT
☒ **GENERATOR** ☐ **S Q GENERATOR**

Company name Ashland Specialty Chemical Company I.D. Number PAD980552251
Site Address 2801 Christopher Columbus Blvd.
County Philadelphia Municipality Philadelphia Zip 19148
Name of Inspector Aleta L. Finney
Name & Title of Responsible Official Joe Rogers, Office Manager
Person Interviewed same Telephone (215) 336-6500
Mailing Address (if different from above) same
Amount of Hazardous Waste Generated per Month: ~2500 Pounds _____ Kgs _____

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____
PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____
GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☒ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name Ashland Distribution Company License Number AC12162NY
Transporter Name _____ License Number _____
Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
F003, F005	Toluene, Acetone	Ashland Distribution
D001	Styrene	3 Broad St
D001	Methyl Methacrylate	Binghamton, NY 13902
D002, D008	Sodium Hydroxide	NYD049253719
U190	Phthalic Anhydride	

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Ashland Chemical ID Number PAD980552251 Date March 20, 2003

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Identification Number	262a.10	262.12	H002
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Authorized transporters only	262a.10	262.12(c)	H003
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Subsequent notification requirements met	262a.12(b)		H004
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper manifest used	262a.10	262.21	H005
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests filled out correctly and completely	262a.20		H006
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests signed and routed properly	262a.23(a)	262.23	H007
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Specified records retained for three years	262a.10	262.40(c)	H014
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Exception reporting procedures followed	262a.42	262.42	H016
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Spill reporting procedures followed	262a.10	262.34(d)	H017
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PPC plan developed and implemented	262a.10	262.34(a)	H018
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements followed for international shipments	262a.10	262.50 262.60	H019
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Source reduction strategy prepared and available (LQG only)	262a.100		H020
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Ashland Chemical ID Number PAD980552251 Date March 20, 2003

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
CONTAINERS (Subchapter I)							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers of hazardous waste in good condition	265a.1	265.171	H026
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers and stored waste compatible	265a.1	265.172	H027
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed to prevent leaks	265a.1	265.173(b)	H029
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container storage areas inspected at least weekly	265a.1	265.174	H031
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper containment and collection systems in place	265a.179		H033
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection ID _____

Field Code _____

INSPECTION REPORT – RESIDUAL WASTE GENERATOR

Site I.D.: PAD980552251
 Site Name: Ashland Chemical
 Address: 2801 Christopher Columbus Blvd.
Philadelphia, PA 19148
 Municipality: Philadelphia
 Responsible Official: Joe Rogers
 Person Interviewed: Joe Rogers
 Inspector: Aleta L. Finney
 eFACTS ID #: PF _____ SF _____

Telephone #: 215-336-6500
 Operator Name: same
 Address: same
 County: Philadelphia
 Title: Office Manager
 Title: Office Manager
 Title: Solid Waste Specialist

Inspection Date: 03 /20 / 2003 Type: 1 No. of Violations: 0 Time: 1:00 pm

Waste Description: <u>Plant Trash</u>	Waste Code: <u>407 & 409</u>
Treatment: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Type: _____
Type of Storage: <input checked="" type="checkbox"/> Containers <input type="checkbox"/> Tanks <input type="checkbox"/> Piles <input type="checkbox"/> Impoundments	
Disposition: Destination Facility <u>BFI Conestoga Landfill</u>	
Location: <u>Morgantown, PA</u>	Type: <u>Landfill</u>
Amount Generated: <u>47 tons/yr</u>	15 tons
Waste Description: _____	Waste Code: _____
Treatment: <input type="checkbox"/> Yes <input type="checkbox"/> No	Type: _____
Type of Storage: <input type="checkbox"/> Containers <input type="checkbox"/> Tanks <input type="checkbox"/> Piles <input type="checkbox"/> Impoundments	
Disposition: Destination Facility _____	
Location: _____	Type: _____
Amount Generated: _____	lb./mo.
Waste Description: _____	Waste Code: _____
Treatment: <input type="checkbox"/> Yes <input type="checkbox"/> No	Type: _____
Type of Storage: <input type="checkbox"/> Containers <input type="checkbox"/> Tanks <input type="checkbox"/> Piles <input type="checkbox"/> Impoundments	
Disposition: Destination Facility _____	
Location: _____	Type: _____
Amount Generated: _____	lb./mo.
Waste Description: _____	Waste Code: _____
Treatment: <input type="checkbox"/> Yes <input type="checkbox"/> No	Type: _____
Type of Storage: <input type="checkbox"/> Containers <input type="checkbox"/> Tanks <input type="checkbox"/> Piles <input type="checkbox"/> Impoundments	
Disposition: Destination Facility _____	
Location: _____	Type: _____
Amount Generated: _____	lb./mo.

INSPECTION REPORT COMMENTS

Company/Facility/Site Name: Ashland Specialty Chemical Company

Identification Number: PAD980552251

Date of Inspection: Thursday, March 20, 2003

Aleta L. Finney, Solid Waste Specialist with the Department, conducted a large quantity hazardous waste generator inspection and a large quantity residual waste inspection. Present from the facility was Joe Rogers, Office Manager.

The inspection began with a short tour of the facility. The facility makes polyester resins. There are three satellite accumulation areas at the facility. These areas had drums that were properly labeled and closed. The main storage area was inspected next. The storage area had 7 drums of hazardous waste and 1 drum on non-hazardous waste. There was one drum of corrosive material, 3 drums of styrene/methyl methacrylate and 3 drums of toluene/acetone. The one drum of non-hazardous waste was from a spill cleanup. The oldest accumulation date on any of the drums is March 3, 2003. All of the drums were properly labeled and closed.

The facility generates plant trash and occasionally, sand blast grit from the cleaning of tanks. There was only plant trash that was at the facility at the time of the inspection. The waste is kept in a roll-off container where the wastes are compacted and ultimately disposed of by BFI. The roll-off itself was not labeled but an area in front of the compactor had the words "residual waste" on them. Mr. Rogers called BFI and requested that another magnet be placed onto the roll-off box with the words "residual waste" on it. BFI came out to the facility during the inspection and put "residual waste" magnets on both sides of the container.

Finally, the paperwork was reviewed. The hazardous waste manifests from the year 2002 were examined. All appeared to be correctly completed and returned to the facility in a timely manner. The residual waste bills of lading were reviewed. The facility gets a pickup from BFI about once per month. The PPC plan, residual and hazardous waste biennial reports and inspection logs were completed. The last time that the facility had HAZWOPER/RCRA training was in both August and September of 2002. The source reduction strategy for residual and hazardous waste was completed as well as the annual certification of residual waste.

No violations were cited.

The results of this inspection were reviewed with and a copy of this report was left with Mr. Rogers before leaving the facility.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature) _____

Date 03/20/03

Inspector Signature) _____

Date 3/20/03

File name: Ashland Chemical (rpt)

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 1/9/2002Time Start 1:45 pmTime Finish 3:30 pm

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR
 ☐ S Q GENERATOR

Company name Ashland Chemical I.D. Number PAD980552251
 Site Address 2801 Christopher Columbus Blvd.
 County Philadelphia Municipality Philadelphia Zip 19148-5103
 Name of Inspector Aleta L. Finney
 Name & Title of Responsible Official Joseph Rogers - Office Manager
 Person Interviewed Joseph Rogers Telephone (215) 336-6500
 Mailing Address (if different from above) same
 Amount of Hazardous Waste Generated per Month: ~5,000 Pounds _____ Kgs _____

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____
 PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____
 GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☒ Small Quantity HandlerUniversal Waste Types Batteries, Fluorescent Bulbs

3. Hazardous Waste Transporters:

Transporter Name Ashland Distribution License Number N4D049253719
 Transporter Name _____ License Number AC12162N4
 Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
F003, F005	Toluene, Acetone	Ashland Distribution Co.
D001	Styrene	3 Broad St.
D001	Methyl Methacrylate	Binghamton, NY 13902
D002, D008	Sodium Hydroxide	
U190	Phthalic Anhydride	

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Ashland Chemical ID Number PA0980552251 Date 1/9/2002

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LIN NO
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H00
X				Identification Number	262a.10	262.12	H00
X				Authorized transporters only	262a.10	262.12(c)	H00
X				Subsequent notification requirements met	262a.12(b)		H00
X				Proper manifest used	262a.10	262.21	H00
X				Manifests filled out correctly and completely	262a.20		H00
X				Manifests signed and routed properly	262a.23(a)	262.23	H00
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H00
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H00
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H01
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H01
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H01
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H01
X				Specified records retained for three years	262a.10	262.40(c)	H01
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H01
X				Exception reporting procedures followed	262a.42	262.42	H01
X				Spill reporting procedures followed	262a.10	262.34(d)	H01
X				PPC plan developed and implemented	262a.10	262.34(a)	H01
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H01
X				Source reduction strategy prepared and available (LQG only)	262a.100		H02
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H02

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name Ashland Chemical ID Number PA0980552251 Date 1/9/2002

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection ID _____

Field Code _____

INSPECTION REPORT – RESIDUAL WASTE GENERATOR

Site I.D.: PAD980552251
 Site Name: Ashland Chemical
 Address: 2801 Christopher Columbus Blvd.
Philadelphia, PA 19148
 Municipality: Philadelphia
 Responsible Official: Joseph Rogers
 Person Interviewed: Joseph Rogers
 Inspector: Aleta L. Finney
 eFACTS ID #: PF _____ SF _____

Telephone #: 215-336-6500
 Operator Name: Same
 Address: _____
 County: Philadelphia
 Title: Office Manager
 Title: Office Manager
 Title: Solid Waste Specialist

Inspection Date: 1/9/2002 Type: Routine No. of Violations: 0 Time: 1:45pm

Waste Description: Plant Trash Waste Code: 407 + 409
 Treatment: ☐ Yes ☒ No Type: _____
 Type of Storage: ☒ Containers ☐ Tanks ☐ Piles ☐ Impoundments
 Disposition: Destination Facility BFI Conestoga Landfill
 Location: Morgantown, PA Type: _____
 Amount Generated: 67 tons/yr lb./mo.

Waste Description: Sand Blast Grit Waste Code: 206
 Treatment: ☐ Yes ☒ No Type: _____
 Type of Storage: ☒ Containers ☐ Tanks ☐ Piles ☐ Impoundments
 Disposition: Destination Facility BFI Conestoga Landfill
 Location: Morgantown, PA Type: _____
 Amount Generated: 8 tons/yr lb./mo.

Waste Description: _____ Waste Code: _____
 Treatment: ☐ Yes ☐ No Type: _____
 Type of Storage: ☐ Containers ☐ Tanks ☐ Piles ☐ Impoundments
 Disposition: Destination Facility _____
 Location: _____ Type: _____
 Amount Generated: _____ lb./mo.

Waste Description: _____ Waste Code: _____
 Treatment: ☐ Yes ☐ No Type: _____
 Type of Storage: ☐ Containers ☐ Tanks ☐ Piles ☐ Impoundments
 Disposition: Destination Facility _____
 Location: _____ Type: _____
 Amount Generated: _____ lb./mo.

Site Name
 ID Number
 Date

 Ashland Chemical
 PA0980552251
 1/9/2002

INSPECTION REPORT – RESIDUAL WASTE GENERATOR (Cont'd)

1 - No Violation Observed 2 - Not-Applicable 3 - Not-Determined 4 - Non-Compliance

STATUS				GENERAL REQUIREMENTS	COMMENTS ATTACHED	CHAPTER CITATION	LINE ITEM
1	2	3	4				
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Designated facility: valid permit? Permit Number (PA) _____	<input type="checkbox"/>	287.6	1
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Biennial report submitted by March 1 of each odd numbered year.	<input type="checkbox"/>	287.52(a)	2
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Written source reduction strategy on file and in effect.	<input type="checkbox"/>	287.53	3
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Waste reduction strategy covers all waste streams.	<input type="checkbox"/>	287.53(b)	4
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Reduction strategy updated every five years or when waste or manufacturing process changes.	<input type="checkbox"/>	287.53(c)	5
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Waste analysis performed: copy on file.	<input type="checkbox"/>	287.54	6
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Annual analysis or certification of waste submitted to Department and designated facility.	<input type="checkbox"/>	287.54(b)(f)	7
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Chemical analysis updated every five years or when waste or manufacturing process changes.	<input type="checkbox"/>	287.54(g)	8
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Generator record keeping requirements.	<input type="checkbox"/>	287.55	9
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operation of disposal or processing facility without a permit.	<input type="checkbox"/>	287.101(a)	10
				STORAGE REQUIREMENTS			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Residual waste not mixed with hazardous waste.	<input type="checkbox"/>	299.111(1)	11
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Waste stored as not to create a safety risk.	<input type="checkbox"/>	299.111(2)	12
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Residual waste not mixed with special handling waste.	<input type="checkbox"/>	299.111(3)	13
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Waste not blown or otherwise deposited outside storage area.	<input type="checkbox"/>	299.111(4)	14
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Storage area inspected; records available.	<input type="checkbox"/>	299.112(c)	15
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All waste stored less than one year.	<input type="checkbox"/>	299.113(a)	16
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Equipment maintained in operable condition.	<input type="checkbox"/>	299.114(a)	17
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Equipment cleaning frequencies maintained.	<input type="checkbox"/>	299.114(c)	18
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Vectors controlled and minimized.	<input type="checkbox"/>	287.115	19
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Run on, runoff minimized; storage areas managed in accordance with Clean Streams Law.	<input type="checkbox"/>	299.116(a)(b)	20
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Waste stored to prevent groundwater degradation.	<input type="checkbox"/>	299.116(c)	21
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Sufficient number of properly constructed storage containers.	<input type="checkbox"/>	299.121	22
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Storage containers labeled properly.	<input type="checkbox"/>	287.121(d)	23
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Storage container height and access requirements.	<input type="checkbox"/>	287.121(e)	24
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Storage tank design standards.	<input type="checkbox"/>	299.122	25
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Storage tanks labeled properly.	<input type="checkbox"/>	287.122 (a)	26
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No putrescible waste or liquid waste stored in piles.	<input type="checkbox"/>	299.112(d), 299.131(b)	27
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Waste storage pile area properly designed, constructed and maintained.	<input type="checkbox"/>	299.131	28
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Storage pad or liner system properly designed and maintained.	<input type="checkbox"/>	299.132	29
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper design and maintenance of leachate and runoff control systems.	<input type="checkbox"/>	299.133	30
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper storage and containment of incinerator ash residue.	<input type="checkbox"/>	299.151	31
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper storage and containment of friable asbestos containing waste.	<input type="checkbox"/>	299.152	32
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper storage and containment of coal ash.	<input type="checkbox"/>	299.153	33
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper storage and containment of PCB containing waste material.	<input type="checkbox"/>	299.154	34
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper storage of whole and processed tires.	<input type="checkbox"/>	299.155	35
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>		
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INSPECTION REPORT COMMENTS

Company/Facility/Site Name: Ashland Chemical Co.

Identification Number: PAD980552251

Date of Inspection: Wednesday, January 09, 2002

Aleta L. Finney, Solid Waste Specialist with the Department, conducted a large quantity hazardous waste generation inspection and a large quantity residual waste inspection. Present from the facility was Joe Rogers, Office Manager.

The inspection began with a short tour of the facility. The facility makes polyester resins. There are still three satellite accumulation areas at the facility. These areas had drums that were properly labeled and closed. The main hazardous waste storage area had seven drums of hazardous waste contained on the storage pad. The oldest accumulation date on any drum of hazardous waste was October 31, 2001. All drums were properly labeled and closed. One drum had just been moved from satellite storage to the main storage pad. Mr. Rogers put the accumulation date on the drum. The facility generally tries to get its hazardous wastes removed every month.

The facility still only generates plant trash and sand blast grit as its only residual wastes. There was only plant trash on the facility grounds at the time of the inspection. This waste is kept in a roll-off where the wastes are compacted and ultimately disposed by BFI. The roll-off had the words "Residual Waste" labeled on its side.

Finally, the paperwork was reviewed. The hazardous waste manifests from the year 2001 were examined. All appeared to be correctly completed and returned to the facility in a timely manner. The residual waste bills of lading were made available for the year 2001. The facility gets the plant trash removed about every three weeks and the sand blast grit is removed less frequently, which depends on when a tank needs to be cleaned. The PPC plan, residual and hazardous waste biennial reports, personnel training records for the year 2001, and the hazardous and residual waste storage area inspection logs were all completed. The source reduction strategy was updated in March of 2000. The annual certification of residual waste for the year 2001 was also completed. The facility is currently working on the hazardous waste biennial report for 2001 as well as the residual waste annual certification for the year 2002.

RECOMMENDATIONS:

- 1) A hazardous waste container that is moved from satellite to the main accumulation area should have an accumulation date put on immediately.

No violations were observed.

The results of this inspection were reviewed with and a copy of this report was left with Mr. Rogers before leaving the facility.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature) _____

Date

01-09-02

Inspector Signature) _____

Date

1/9/2002

File name: Ashland Chemical.doc

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 11/16/2000
Time Start 1:45 pm
Time Finish 3:15 pm

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATOR

Company name Ashland Chemical I.D. Number PAD960552251
Site Address 2801 Christopher Columbus Blvd
County Philadelphia Municipality Philadelphia Zip 19146-5103
Name of Inspector Aleta L. Finney
Name & Title of Responsible Official Joseph Rogers - Office Manager
Person Interviewed Joseph Rogers Telephone (215) 336-6500
Mailing Address (if different from above) _____

Amount of Hazardous Waste Generated per Month: 5,000 Pounds _____ Kgs _____

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____

PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____

GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☒ Small Quantity Handler

Universal Waste Types Fluorescent Bulbs + Batteries

3. Hazardous Waste Transporters:

Transporter Name Ashland Chemical Co. License Number V51914TN -

Transporter Name Freehold Cartage, Inc License Number AE383N - NJ

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
U190, D004	Phthalic Anhydride	Ashland Chemical Co.
D001, D007	Styrene, Methyl Methacrylate	3 Broad St.
D002, D008	Sodium Hydroxide	Binghamton, NY 13902
F003, F005	Toluene, Acetone	N4D049253719
D008	Lead (containing soil)	Michigan Disposal Waste
		Treatment Plant
		49350 N.J. I-94 Svc. Drive
		Belleville, MI 48111

MID000724831

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Ashland Chemical ID Number PAD980552251 Date 11/16/2000

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
				Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Ashland Chemical ID Number PAD980552251 Date 11/16/2000

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Ashland Chemical ID Number PAID 980552251 Date 11/16/2000

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				LQG TANKS (Subchapter J)			
	X			Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
				Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
				Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
				Tanks labeled to accurately identify contents	265a.194		H044
				Required inspections completed and documented in operating log	265a.195	265.195	H045
				Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
				Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
	✓			Special small quantity generator requirements	265a.1	265.201	H048
				SQG TANKS			
	X			Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
				Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
				If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
				Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
				Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
				All waste removed at closure	265a.1	265.201(d)	H056
				Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
				Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
	✓			Incompatible waste requirements met	265a.1	265.201(f)	H059

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Ashland Chemical ID Number PA0980552251 Date 11/16/2000

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				Containment Buildings (Subchapter T)			
	X			Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
				Meets special requirements if liquids present	265a.1	265.1101(b)	H062
				Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1)(i)	H063
				Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1)(ii)	H064
				Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1)(iii)	H065
				No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1)(iv)	H066
				Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
			✓	Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H068
				Drip Pads (Subchapter S)			
	X			Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
				Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
				(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
				(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
				Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
				Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
				Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
				Release reporting requirements met	265a.1	265.443(m)	H076
			✓	Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077

INSPECTION REPORT COMMENTS

Company/Facility/Site Name: Ashland Chemical Company

Identification Number: PAD980552251

Date of Inspection: Thursday, November 16, 2000

Aleta L. Finney, Solid Waste Specialist with the Department, conducted a large quantity hazardous waste generation inspection. Present from the facility was Joe Rogers, Office Manager.

The inspection began with a short tour of the facility. The facility is a manufacturer of polyester resins, which are shipped to a variety of customers for different uses. Mr. Rogers explained that there was a recent incident, which entailed power failure of a reactor due to PECO. A polyester resin, which was contained within a tank for mixing purposes at the time of the failure was pumped out and put into a tank. The resin then unexpectedly became solid for which the company believed it had no use. The facility cleaned out the tank and put the hardened resin into drums for offsite disposal as a hazardous waste. They then found a customer for the resin after about 24 drums had been shipped offsite. The approximately 160 drums that are still onsite will be sent offsite tonight to the customer after the hazardous waste labels are covered.

The facility still has three satellite accumulation areas. All the drums were labeled with a hazardous waste sticker. The main storage area was empty as the facility just had a shipment of hazardous waste on Wednesday, November 15, 2000.

Finally, the paperwork was reviewed. The facility's manifests from April to the present were available and appeared complete with the return copies from the TSD. Personnel training records were also reviewed. The facility has recently had a 4 HAZWOPER refresher course. The hazardous waste storage area inspection logs were also available and reviewed from the beginning of the year. The PPC plan was also available and appeared up-to-date.

No violations were observed.

The results of this inspection were reviewed with and a copy of the report left with Mr. Rogers prior to leaving the facility.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature) _____

Date 11/16/00

Inspector Signature) _____

Date 11/16/2000

File name: Ashland Chemical 11-16-2000.doc

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 4/14/00
Time Start 1:30 pm
Time Finish 3:00 pm

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR ☐ S Q GENERATOR

Company name Ashland Chemical I.D. Number PAD 960552251
Site Address 2801 Christopher Columbus Blvd
County Philadelphia Municipality Philadelphia Zip 19148
Name of Inspector Aleta L. Finney
Name & Title of Responsible Official Joseph Rogers - Office Manager
Person Interviewed Joseph Rogers - Office Manager Telephone (215) 336-6500
Mailing Address (if different from above) _____
Amount of Hazardous Waste Generated per Month: ~5000 Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____

PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____

GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☒ Small Quantity Handler

Universal Waste Types Fluorescent Bulbs ~ 70 lbs.

3. Hazardous Waste Transporters:

Transporter Name Ashland Chemical Company License Number SO3XA1N4

Transporter Name _____ License Number _____

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D004, D007, U190	Phthalic Anhydride (solids)	Ashland Chemical Company
D001	Styrene	3 Broad St.
D001, D007	Styrene, Methyl Methacrylate	Binghamton, NY 13902
F003, F005	Toluene, Acetone	NYD049253719
D011	Filter Bags	
D001	Off-spec/shelf-life exceedance	
D001, D007	Spent Carbon	
D002, D007, D008	Sodium Hydroxide	

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Ashland Chemical Co ID Number PAD980552251 Date 3/10/2000
 1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
X				Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Ashland Chemical Co. ID Number PAD980552251 Date 3/10/2000

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Ashland Chemical ID Number PAD980552251 Date 3/10/2000

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				LQG TANKS (Subchapter J)			
	X			Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
				Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
				Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
				Tanks labeled to accurately identify contents	265a.194		H044
				Required inspections completed and documented in operating log	265a.195	265.195	H045
				Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
				Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
				Special small quantity generator requirements	265a.1	265.201	H048
				SQG TANKS			
	X			Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
				Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
				If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
				Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
				Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
				All waste removed at closure	265a.1	265.201(d)	H056
				Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
				Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
				Incompatible waste requirements met	265a.1	265.201(f)	H059

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Ashland Chemical ID Number PAID980552251 Date 3/10/2000

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				Containment Buildings (Subchapter T)			
	X			Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
				Meets special requirements if liquids present	265a.1	265.1101(b)	H062
				Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1) (i)	H063
				Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1) (ii)	H064
				Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1) (iii)	H065
				No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1) (iv)	H066
				Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
	✓			Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H068
				Drip Pads (Subchapter S)			
	X			Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
				Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
				(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
				(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
				Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
				Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
				Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
				Release reporting requirements met	265a.1	265.443(m)	H076
	✓			Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077

INSPECTION REPORT - RESIDUAL WASTE GENERATOR

Generator I.D. # PA 8980552251 Telephone # (215) 336-6500
 Site Name Ashland Chemical CO. Operator Name _____
 Site Address 2801 Christopher Columbus Blvd. Address _____
Philadelphia, PA 19148
 Municipality Philadelphia County Philadelphia
 Responsible Official Joseph Rogers Title Office Manager
 Person Interviewed Joseph Rogers Title Office Manager
 Inspector Aleta L. Finney Time 1:30pm

Inspection Date 10/31/00 Inspection Type 01 Inspector I.D. # 21131 # Violation 00

INSPECTION TYPE

01 Routine 04 Follow Up 07 Complaint
 02 Spill Response 05 Sampling Only 08 Record Rev
 03 Remedial Action 06 Ground Water 09 Other

Comment ROUTINE INSPECTION

Waste Description: Plant trash Waste Code: 407+409
 Treatment ☐ Yes ☒ No Type _____
 Type of Storage: ☒ Containers _____ Tanks _____ Piles _____ Impoundments
 Disposition: Destination Facility Conestoga Landfill
 Location P.O. Box 128 Morgantown, PA 19543 Type _____
 Amount Generated: ~10,000 lb./mo.

Waste Description: sand blast grit Waste Code: 109
 Treatment ☐ Yes ☒ No Type _____
 Type of Storage: ☒ Containers _____ Tanks _____ Piles _____ Impoundments
 Disposition: Destination Facility Conestoga Landfill
 Location P.O. Box 128 Morgantown, PA 19543 Type _____
 Amount Generated: ~6,000 lb./mo.

Waste Description: _____ Waste Code: _____
 Treatment ☐ Yes ☐ No Type _____
 Type of Storage: _____ Containers _____ Tanks _____ Piles _____ Impoundments
 Disposition: Destination Facility _____
 Location _____ Type _____
 Amount Generated: _____ lb./mo.

Generator Name Ashland Chemical Co.Date 3/10/2000**INSPECTION REPORT - RESIDUAL WASTE GENERATOR**

1 = No Violation Observed		2 = Not Applicable		3 = Not Determined		4 = Non-Compliance	
Chapter Citation	Requirement	Status				Line Number	
25 Pa Code	GENERAL PROVISIONS	1	2	3	4		
287.6	Designated facility: valid permit? Permit Number (PA) _____					3001	
287.52(a)	Biennial report submitted by March 1 of each odd numbered year.	X				3002	
287.53	Written source reduction strategy on file and in effect.	X				3003	
287.53(b)	Waste reduction strategy covers all waste streams.	X				3004	
287.53(c)	Reduction strategy updated every five years or when waste or manufacturing process changes.	X				3005	
287.54	Waste analysis performed: copy on file.	X				3006	
287.54(b, f)	Annual analysis or certification of waste submitted to Department and designated facility.	X				3007	
287.55	Small quantity generator record keeping requirements.		X			3008	
287.101(a)	Operation of disposal or processing facility without a permit.		X			3009	
	STORAGE REQUIREMENTS						
299.111(1)	Residual waste not mixed with hazardous waste.	X				3010	
299.111(2)	Waste stored as not to create a safety risk.	X				3011	
299.111(3)	Residual waste not mixed with special handling waste.	X				3012	
299.111(4)	Waste not blown or otherwise deposited outside storage area.	X				3013	
299.112(c)	Storage area inspected; records available.					3014	
299.113(a)	All waste stored less than one year.	X				3015	
299.114(a)	Equipment maintained in operable condition.	X				3016	
299.114(c)	Equipment cleaning frequencies maintained.	X				3017	
299.115	Vectors controlled and public nuisances prevented.	X				3018	
299.116(a)(b)	Run on, runoff minimized; storage areas managed in accordance with Clean Streams Law.	X				3019	
299.116(c)	Waste stored to prevent groundwater degradation.	X				3020	
299.121	Sufficient number of properly constructed storage containers.	X				3021	
299.122	Storage tank design standards.		X			3022	
299.112(d), 299.131(b)	No putrescible waste or liquid waste stored in piles.		X			3023	
299.131	Waste storage pile area properly designed, constructed and maintained.		X			3024	
299.132	Storage pad or liner system properly designed and maintained.		X			3025	
299.133	Proper design and maintenance of leachate and runoff control systems.		X			3026	
299.151	Proper storage and containment of incinerator ash residue.		X			3027	
299.152	Proper storage and containment of friable asbestos containing waste.		X			3028	
299.153	Proper storage and containment of coal ash.		X			3029	
299.154	Proper storage and containment of PCB containing waste material.		X			3030	

C Code
orm Code
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Ashland Chemical

ASH 71-8310

Industrial Chemicals
& Solvents Division
Environmental Services

Ashland Chemical Company, Inc. ☐ Check here if this is a recertification
Division of
Ashland Inc.
P.O. Box 1300
Binghamton, NY 13902
Tel (800) 637-7922
Fax (800) 637-7922

GENERAL INFORMATION

Generator Name: ASH. CHEM. COMPOSITE POLYMERS Generator USEPA ID#: PA 980552 251
Generator Address: 2801 CHRIS COLUMBUS BLVD. Generator State ID#: PA
PHILADELPHIA, PA 19148
Technical Contact: JOE ROGERS Billing Address: ASHLAND DISTRIBUTION COMPANY
Phone: 215-336-6500 3 Broad Street
Fax: 215-336-2878 Binghamton, NY 13902
Ashland Sales Rep: Brad Hepler Billing Contact: Roberta Thompson
Phone: 607-723-8254 Phone: 607-723-8254
Fax: 607-723-1052 Fax: 607-723-1052

PROPERTIES AND COMPOSITION

Process Generating Waste: DRIPPINGS WHILE DISCONNECTING HOSE FROM TANK WAGON.
Waste Name: WASTE WATER & MALEIC ANHYDRIDE
Is this a USEPA hazardous waste (40CFR Part 261)? Yes ☐ No ☒ Wastewater ☐ Non-wastewater ☒
Identify ALL USEPA listed and characteristic waste code numbers: N/A

State Waste Codes: N/A
Physical State @ 70 °F: Solid ☐ Liquid ☒ Both ☐ Single Layer ☒ Multilayer ☐ Free liquid range: 95 to 100
H: Range 5 to 9 OR N/A ☐ Strong odor ☐ Describe _____ Color _____
Liquid Flash Point <73°F ☐ 73-99°F ☐ 100-139°F ☐ 140-199°F ☐ ≥200°F ☐ N/A ☒ Closed Cup ☐ Open Cup ☐

HEMICAL COMPOSITION: List ALL constituents present in any concentration and forward available analysis.

Constituents	Range/Units	Constituents	Range/Units
<u>WATER / SNOW</u>	<u>90-99%</u>		
<u>MALEIC ANHYDRIDE</u>	<u>1-10%</u>		

TOTAL COMPOSITION MUST EQUAL OR EXCEED 100%

Analytical data attached ☐

SHIPPING INFORMATION

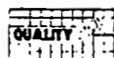
Packaging: Bulk Solid ☐ Bulk Liquid ☐ Drum ☒ Type/Size: 55 GAL Other _____
Anticipated volume: 1 Shipping Frequency: 1

SAMPLING INFORMATION

Is a sample required? YES ☐ NO ☒ MSDS attached ☒
Date Sampled: _____ Sampler's Name/Company: _____
Generator's Agent Supervising Sampling: _____

OTHER HAZARDOUS CHARACTERISTICS

Specific Gravity: Range: 1.0 to 1.2 OR Actual _____ UHC present ☐
Is this a Benzene NESHAP Waste?: ☐ YES ☒ NO BTU Value (per pound): ☒ <5,000 OR ☐ >5,000



Ashland Chemical's
Commitment to
Quality and Productivity

Headquarters:
5200 Blazer Parkway
Dublin, Ohio 43017
(614) 790-3333

<http://www.ashchem.com>

Cable Address: Aroplaz OH
Telex: 245385
Answerback: ASHCHEM
Fax: (614) 790-4119



A Responsible Care
Company

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CONTAMINANTS:

☐ TCLP☐ TOTALPROFILE # 71-8310
☒ NONE IN THIS SECTION PRESENT

REGULATORY

PA#	NAME	LEVEL	ACTUAL
004	Arsenic	<input type="checkbox"/> >5.0	
005	Barium	<input type="checkbox"/> >100.0	
006	Cadmium	<input type="checkbox"/> >1.0	
007	Chromium	<input type="checkbox"/> >5.0	
008	Lead	<input type="checkbox"/> >5.0	
009	Mercury	<input type="checkbox"/> >0.2	
010	Selenium	<input type="checkbox"/> >1.0	
011	Silver	<input type="checkbox"/> >5.0	
012	Endrin	<input type="checkbox"/> >0.02	
013	Lindane	<input type="checkbox"/> >0.4	
014	Methoxychlor	<input type="checkbox"/> >10.0	
015	Toxaphene	<input type="checkbox"/> >0.5	
016	2,4-D	<input type="checkbox"/> >10.0	
017	2,4,5-TP (Silvex)	<input type="checkbox"/> >1.0	
018	Benzene	<input type="checkbox"/> >0.5	
019	Carbon tetrachloride	<input type="checkbox"/> >0.5	
020	Chlordane	<input type="checkbox"/> >0.03	
021	Chlorobenzene	<input type="checkbox"/> >100.0	
022	Chloroform	<input type="checkbox"/> >6.0	
023	o-Cresol	<input type="checkbox"/> >200.0	

REGULATORY

EPA#	NAME	LEVEL	ACTUAL
D024	m-Cresol	<input type="checkbox"/> >200.0	
D025	p-Cresol	<input type="checkbox"/> >200.0	
D026	Cresol (total)	<input type="checkbox"/> >200.0	
D027	1,4-Dichlorobenzene	<input type="checkbox"/> >7.5	
D028	1,2-Dichloroethane	<input type="checkbox"/> >0.5	
D029	1,1-Dichloroethylene	<input type="checkbox"/> >0.7	
D030	2,4-Dinitrotoluene	<input type="checkbox"/> >.13	
D031	Heptachlor	<input type="checkbox"/> >0.008	
D032	Hexachlorobenzene	<input type="checkbox"/> >0.13	
D033	Hexachloro-1,3-butadiene	<input type="checkbox"/> >0.5	
D034	Hexachloroethane	<input type="checkbox"/> >3.0	
D035	Methyl ethyl ketone	<input type="checkbox"/> >200.0	
D036	Nitrobenzene	<input type="checkbox"/> >2.0	
D037	Pentachlorophenol	<input type="checkbox"/> >100.0	
D038	Pyridine	<input type="checkbox"/> >5.0	
D039	Tetrachloroethylene	<input type="checkbox"/> >0.7	
D040	Trichloroethylene	<input type="checkbox"/> >0.5	
D041	2,4,5-Trichlorophenol	<input type="checkbox"/> >400.0	
D042	2,4,6-Trichlorophenol	<input type="checkbox"/> >2.0	
D043	Vinyl chloride	<input type="checkbox"/> >0.2	

TRANSPORTATION INFORMATION

Is this a DOT Hazardous Material? ☐ Yes ☒ No

Proper Shipping Name:

NON-DOT, NON RCRA REGULATED MATERIAL

Hazard Class:

N/A

I.D.#:

N/A

Packing Group:

N/A

Additional Description:

N/A

ERCLA Reportable Quantity

N/A

RQ Units (lb/ka):

N/A

ERG#

N/A

SPECIAL HANDLING:

N/A

Additional Page(s) Attached

GENERATOR'S CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize the generator to obtain a sample from any waste shipment for purposes of recertification. If the waste stream or process generating the waste changes, I will notify Ashland Distribution Co. prior to shipment of the waste.

Signature

JOSEPH V. ROGERS
OFFICE MANAGER
Printed (or typed) name and title

Date

02-29-00

I authorize Ashland Distribution Co. to act as my agent to make corrections to this profile sheet, such corrections being consistent with the sample presented for characterization and/or regulatory requirements of state and federal agencies. I understand that a corrected copy will be sent to me.

☒ YES☐ NOINITIAL: JS

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INSPECTION REPORT COMMENTS

Company/Facility/Site Name: Ashland Chemical Company

Identification Number: PAD980552251

Date of Inspection: Friday, March 10, 2000

A residual waste and large quantity hazardous waste generator inspection was conducted by Aleta L. Finney. Present from the facility was Joseph Rogers, Office Manager.

Ashland is a manufacturer of unsaturated polyester resins. These resins are used in many different manufacturing processes including bowling balls, bathroom tubs and sinks and automotive products.

The inspection started in the main storage area. The oldest accumulation date on a drum was February 29, 2000. All drums were properly labeled. Two types of waste were seen in storage: (1) Butyl Methacrylate - D001 (waste combustible liquid) and Styrene and Methyl Methacrylate - D001 (waste flammable liquid). There were only 4 drums of this waste in storage.

There were also 2 areas of satellite accumulation at the facility. One area is in the tank wagon loading area when the resins are filtered before loaded onto truck and shipped to customer. The second area was located near the esterified water tank storage area where samplings of the resin and contaminated glassware are taken. Both drums were properly labeled and closed.

Residual waste generated onsite is produced in the form of office/lunchroom wastes, packaging wastes (empty/drained bags, liners, jars, supersacks), operational wastes (rags, gloves, dust masks, goggles, paper suits) and laboratory wastes (plastic pipettes, gelled resin in cups, plastic cups). These residual wastes are collected by BFI. All of the waste is stored in a large roll-off container and compacted. This roll-off was properly labeled.

In the hazardous waste storage area, a drum of maleic anhydride and water was also observed. It was labeled as non-hazardous/non-DOT waste with the generator information and date on the label. Mr. Rogers stated that this drum was the result of a spill that had occurred during the transference of the material. The material had spilled in the snow and was promptly cleaned up. This drum is the material from that spill. The material was profiled and that profile is attached to this report.

Finally, the paperwork was examined. The manifests were reviewed and were correctly completed. The facility receives their return copies from the disposal facility promptly. Inspection logs for the storage area, PPC plan and personnel training records were made available and in order. Both the hazardous and residual waste biennial reports and source reduction strategies were completed. However, the source reduction strategies should be updated this year because it has been about 5 years since they were last updated. Inspection logs should also be updated to specifically include the roll-off container. Mr. Rogers was sent 2 copies of the source reduction strategies on 3/22/2000.

No violations were observed.

The results of this inspection were reviewed with Mr. Rogers before leaving the facility.

In the "Requirement" Section of this Inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this Inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature) Copy mailed to facility Date 3/28/00
Inspector Signature Aleta L. Finney Date 3/28/00
File name: Ashland Chemical Page 10 of 10